



State of Utah

GARY R. HERBERT  
Governor

GREG BELL  
Lieutenant Governor

Department of  
Environmental Quality

Amanda Smith  
Executive Director

DIVISION OF ENVIRONMENTAL  
RESPONSE AND REMEDIATION

Brent H. Everett  
Director

1266097 - R8 SDMS

ERRC-134-10

July 12, 2010

Jeff Graham, Agent  
Parcel A-2 Silver Creek VCP Site  
Silver Creek – Robert Larsen Investors, LLC  
7865 North Victory Ranch Drive  
Kamas, Utah 84036

**RE: Parcel A-2, Silver Creek-Robert Larsen Investors, LLC Voluntary Cleanup Site, VCP #068,  
Park City, Utah**

Dear Mr. Graham:

The Division of Environmental Response and Remediation (DERR) has completed review of the *Environmental Assessment to Support UDEQ VCP Application (EA)* dated October 22, 2009, for the referenced site. The document is considered the Environmental Assessment under the Voluntary Cleanup Program.

The DERR's review comments are enclosed with this letter. It is requested that Silver Creek-Robert Larsen Investors, LLC, address the comments in conjunction with the development of a *Site Characterization Work Plan* for the site. As noted during our site visit on June 23, 2010, the DERR will request the U.S. Environmental Protection Agency (EPA) review and accept the characterization strategy, and remedial strategy if necessary, as well.

If you have any questions, please contact the undersigned at (801) 536-4092. Thank you for your assistance in this matter.

Sincerely,

Elizabeth Palmer-Yeomans, P.G.  
Project Manager  
Division of Environmental Response and Remediation

EPY/eds

cc: Kathryn Hernandez, U.S. EPA Region VIII  
Sam Wilkes, Tetra Tech, Inc.  
Mo Slam, Division of Environmental Response and Remediation  
Steve Jenkins, Director, Summit County Public Health Department  
Michael Egan, P.G., Tetra Tech, Inc.

**DERR REVIEW COMMENTS**  
**PARCEL A-2 SILVER CREEK VCP SITE**  
**ENVIRONMENTAL ASSESSMENT**  
July 6, 2010

**General Comments**

1. Based on the information collected to date, it is necessary to characterize the Site, per the requirements of the VCP Agreement, to determine if the Site is potentially impacted. Please propose a sampling strategy to characterize the Site. To help facilitate acceptance of the Site Characterization Workplan, DERR provided you with two examples of Sampling Analysis Plans that had previously been accepted for the Lower Silver Creek area. It is acceptable to use these plans to help draft a document for review.
2. The proposed sample scheme should evaluate surface and subsurface soil conditions. For this sampling event, please include surface samples over the 0-2 inch horizon and subsurface samples from two inches to one foot below ground surface. It may be convenient to include as subsurface samples all evenly numbered locations. If there are wetlands on the property, surface water and sediment samples should also be collected. Please collect at least one sample from the piles of former sewage pond soils which were placed to the east of the pond. Please note that additional sampling at different intervals may be necessary in the future if contaminants are reported.
3. Please survey the eastern property boundary to determine if the property line runs adjacent to the old fence or to the existing sewer line. Based on the June 23, 2010 site visit, the old fence is directly adjacent to the creek in the middle portion of the site and the sewer line appeared to be approximately 8-10 feet east and above the creek over the entire length of the Property. This is important information since it will help establish the relationship of the Site to the Lower Silver Creek floodplain. Survey data is also important since it will help establish sample location along the eastern property boundary.
4. Future sampling should also evaluate potential transport mechanisms such as irrigation ditches. Based on the site visit, please collect samples from the ditches and directly outside the ditches to assess potential impact. In the Site Characterization Workplan, please include a map detailing the location of all ditches that traverse the Site as well as any intake or outfall locations.
5. Please propose a strategy to evaluate the groundwater pathway.
6. Please ensure that future sampling and laboratory analysis is performed under a Quality Assurance Project Plan that includes a level III reporting package.
7. Please describe the installation history of the sewer line that runs along the eastern portion of the site. Please indicate the depth of the line and whether there was any note of possible tailings that may have been encountered during the installation. Please indicate how soil that was dug up during the installation was managed. Due to the location of this line along the eastern portion of the site, it is prudent to collect a few samples to verify there is no potential impact. Please propose sampling to address this comment.
8. DERR will accept the screening levels established for Lower Silver Creek. Please include the levels in the Site Characterization Workplan.

### **Specific Comments:**

1. Page 1, Environmental Assessment Legal Description: Please submit the A.L.T.A. Survey Plat Map.
2. Environmental Assessment, Page 2, Operational History: In the Site Characterization Workplan, please discuss the history of the former sanitary sewer holding pond. As an example, please indicate if it was a permitted facility and by which Agency. In addition, please indicate if it received any water from the Lower Silver Creek. Based on the June 2010 site visit, several pipes were observed in the basin. Please discuss the purpose and history of these pipes and the drainage. Please indicate where and how the sewer sludge from this area was managed. This information is necessary to evaluate how this area should be characterized. Sampling for contaminants other than metals may be appropriate after the history of this area has been further evaluated.
3. Environmental Assessment, Page 2, Operational History: Please elaborate on the information regarding the irrigation ditch(es) cited in the application and the EA. Similar to General Comment #4 above, please indicate how long the ditches operated, the source of the water and where the water traveled to/from. Please also elaborate on connections to other ditches/ponds; and, any possible contaminants associated with it.
4. Environmental Assessment, Page 2, Contamination, last sentence of first paragraph. "The stream and its floodplain are not located on the subject parcel". At present, there is not enough information to concur with this statement. Please see General Comment #3 above. Furthermore, the subject parcel does lie within the Summit County Soil Overlay Zone.

End of Review Comments.



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RESPONSE AND REMEDIATION

Brent H. Everett  
Director

ERRC-151-10

July 29, 2010

Vaughn Burbidge  
Forestdale Investments, LLC  
911 South Rio Grande  
Salt Lake City, Utah 84111

Jim Seaberg  
Sundborn, LLC  
978 Woodoak Lane  
Salt Lake City, Utah 84117

**RE: Park City Business Center Subdivision VCP Site #C071, Park City, UT**

Dear Mr. Burbidge and Mr. Seaberg:

The Utah Department of Environmental Quality (UDEQ) has executed the Voluntary Cleanup Program (VCP) Agreement for the Park City Business Center Subdivision, Lower Silver Creek VCP Site, located at 4006 through 4665 North Forestdale Drive, Park City, Summit County, Utah. Please find a copy of the executed agreement attached for your records.

Should you have any questions regarding this letter, the agreement or the voluntary cleanup process, please contact me at (801) 536-4092.

Sincerely,

*Elizabeth Palmer*

Elizabeth Palmer, P.G., Project Manager  
Division of Environmental Response and Remediation

EAP/eds

Enclosure

cc: Steve Jenkins, Summit County Public Health Department (w/out enclosure)  
Kathryn Hernandez, U.S. Environmental Protection Agency, Region VIII (w/out enclosure)  
Adryan Slaght, Summit County (w/out enclosure)  
Richard Burbidge, Attorney for Applicants (w/out enclosure)  
Tom Atkinson, AGECE (w/out enclosure)



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DIVISION OF ENVIRONMENTAL  
RESPONSE AND REMEDIATION

Brent H. Everett  
Director

ERRC-181-10

August 25, 2010

Jeff Graham  
Parcel A-2, Silver Creek-Robert Larsen Investors, LLC  
7865 North Victory Ranch Drive  
Kamas, Utah 84036

**RE: Parcel A-2, Silver Creek – Robert Larsen Investors, LLC, Voluntary Cleanup Site, VCP #068, Park City, Utah**

Dear Mr. Graham:

The Division of Environmental Response and Remediation (DERR) has completed review of the Final *Combined Sampling and Analysis (SAP) and Quality Assurance Quality Control (QAPP) Plans*, dated August 03, 2010, for the referenced site.

The SAP & QAPP adequately addresses the DERR's concerns and previous comments and based on the data and information submitted to date, the DERR has no objections to implementing the Final SAP & QAPP in the interest of moving this project forward and gathering additional information about the site. The document addresses final comments from the U.S. Environmental Protection Agency, as well. Please keep the DERR informed of the field schedule as a DERR representative will be on-site to oversee the sampling and to collect split samples.

If you have any questions, please contact the undersigned at (801) 536-4092. Thank you for your assistance in this matter.

Sincerely,

Elizabeth Palmer, P.G.  
Project Manager  
Division of Environmental Response and Remediation

EAP/eds

cc: Kathryn Hernandez, U.S. Environmental Protection Agency, Region VIII  
Sam Wilkes, Tetra-Tech  
Mike Egan, Tetra-Tech  
Steve Jenkins, Director, Summit County Public Health Department  
Mo Slam, UDEQ-DERR, Richardson Flats Project Manager  
Adryan Slaght, Planning Department, Summit County



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DIVISION OF ENVIRONMENTAL  
RESPONSE AND REMEDIATION

Brent H. Everett  
Director

ERRC-180-10

August 23, 2010

Vaughn Burbidge  
Forestdale Investments, LLC  
911 South Rio Grande  
Salt Lake City, Utah 84111

Jim Seaberg  
Sundborn, LLC  
978 Woodoak Lane  
Salt Lake City, Utah 84117

**RE: Park City Business Center Subdivision Voluntary Cleanup Site, VCP #071, Park City, Utah**

Dear Mr. Burbidge and Mr. Seaberg:

The Division of Environmental Response and Remediation (DERR) has completed review of the Final *Sampling and Analysis Plan & Quality Assurance Project Plan* (SAP & QAPP) dated August 17, 2010 for the referenced site.

The SAP & QAPP adequately addresses the DERR's concerns and previous comments and based on the data and information submitted to date, the DERR has no objections to implementing the Final SAP & QAPP in the interest of moving this project forward and gathering additional information about the site. The document addresses final comments from the U.S. Environmental Protection Agency, as well. Please keep the DERR informed of the field schedule as a DERR representative will be on-site to oversee the sampling and to collect split samples.

If you have any questions, please contact the undersigned at (801) 536-4092. Thank you for your assistance in this matter.

Sincerely,

Elizabeth Palmer, P.G.  
Project Manager  
Division of Environmental Response and Remediation

EAP/eds

cc: Kathryn Hernandez, U.S. Environmental Protection Agency, Region VIII  
Sam Wilkes, Tetra-Tech  
Tom Atkinson, AGECEC  
Richard Burbidge, Attorney  
Steve Jenkins, Director, Summit County Public Health Department  
Mo Slam, UDEQ-DERR, Richardson Flats Project Manager  
Adryan Slaght, Planning Department, Summit County



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RESPONSE AND REMEDIATION

Brent H. Everett  
Director

ERRC-178-10

August 23, 2010

Jeff Schoenbacher  
Environmental Coordinator  
Building Department  
Park City Municipal Corporation  
1255 Iron Horse Drive  
P.O. Box 1480  
Park City, Utah 84060

Robert Jasper  
Summit County Manager  
60 North Main  
Coalville, Utah 84017

**RE: Executed Voluntary Cleanup Agreement (VCP # C070)**

Dear Mr. Schoenbacher and Mr. Jasper:

The Utah Department of Environmental Quality (UDEQ) has executed the Voluntary Cleanup Agreement for the Triangle Parcel, Lower Silver Creek property located along the eastern frontage road of US-40 near Park City, Utah. A copy of the executed agreement is enclosed with this letter.

The UDEQ looks forward to continuing work with Park City Municipal Corporation and Summit County to move the site through the Voluntary Cleanup Program (VCP). The UDEQ is currently reviewing the Environmental Assessment submitted with the VCP Application and will provide comments under separate cover. Should you have any questions regarding this letter, the agreement or the Voluntary Cleanup process, please contact me at (801) 536-4104.

Sincerely,

Joseph H. Katz, Project Manager  
Division of Environmental Response and Remediation

JHK\eds

Enclosure

cc: Steve Jenkins, Summit County Public Health Department (w/o enclosure)  
David Brickey, Summit County Attorney (w/o enclosure)  
Kathryn Hernandez, U.S. Environmental Protection Agency, Region VIII (w/o enclosure)  
Muhammad Slam, Utah Department of Environmental Quality (w/o enclosure)  
Roger Evans, Park City Municipal Corporation (PCMC) (w/o enclosure)  
Diane Foster, PCMC (w/o enclosure)  
Kathy Harris, AMEC (w/o enclosure)